

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*

Debtors.¹

PROMESA Title III

Case No. 17-BK-3283-LTS
(Jointly Administered)

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

PUERTO RICO ELECTRIC POWER AUTHORITY,

Debtor.

Case No. 17-BK-4780-LTS

This Court Filing Relates Only to
Case No. 17-BK-4780-LTS

**JOINDER OF SYNCORA GUARANTEE INC. TO THE OBJECTION OF ASSURED
GUARANTY CORP. AND ASSURED GUARANTY MUNICIPAL CORP. TO THE
URGENT JOINT MOTION OF OFFICIAL COMMITTEE OF UNSECURED
CREDITORS FOR ORDER, PURSUANT TO BANKRUPTCY CODE SECTION 926(A),
AUTHORIZING COMMITTEE TO PURSUE CERTAIN AVOIDANCE ACTIONS ON
BEHALF OF PUERTO RICO ELECTRIC POWER AUTHORITY**

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the "Commonwealth") (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747). (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

To the Honorable United States District Judge Laura T. Swain:

Syncora Guarantee Inc. (“Syncora”) respectfully submits this joinder to the opposition filed by Assured Guaranty Corp. and Assured Guaranty Municipal Corp. (collectively, “Assured”) to the *Urgent Motion of Official Committee of Unsecured Creditors for Order, Pursuant to Bankruptcy Code Section 926(a), Authorizing Committee to Pursue Certain Avoidance Actions on Behalf of Puerto Rico Electric Power Authority* [Dkt. No. 1354] (the “Motion”)² filed by the Official Committee of Unsecured Creditors.

JOINDER

As this Court is aware, Syncora recently reached an agreement to join PREPA’s restructuring support agreement among the Oversight Board, AAFAF, the Ad Hoc Group of PREPA Bondholders and Assured filed on May 10, 2019 [Dkt. No 1235] (the “RSA”). The RSA provides that only the Government Parties (as defined in the RSA) have standing or are otherwise permitted to bring a Lien Challenge solely to preserve the applicable cause of action, but not to prosecute the Lien Challenge at such time. *See* RSA §§ 3(e), (i). Syncora incorporates the arguments made by Assured in its opposition to the Motion as if set forth herein and respectfully requests that the Motion be denied.

² Defined terms used herein without definition have the meanings assigned to them in the Motion.

Dated: June 21, 2019
San Juan, Puerto Rico

**GOLDMAN ANTONETTI & CORDOVA,
LLC**

By: /s/ Carlos A. Rodríguez-Vidal

Carlos A. Rodríguez-Vidal

USDC-PR No. 201213

Solymar Castillo-Morales

USDC-PR NO. 218310

P.O. Box 70364

San Juan, PR 00936-8364

Tel.: (787) 759-4117

Fax: (787) 767-9177

Email: crodriguez-vidal@gaclaw.com

scastillo@gaclaw.com

Counsel for Syncora Guarantee Inc.

DEBEVOISE & PLIMPTON LLP

By: /s/ My Chi To

My Chi To*

Elie J. Worenklein*

919 Third Avenue

New York, New York 10022

Tel.: (212) 909-6000

Fax: (212) 909-6836

Email: mcto@debevoise.com

eworenklein@debevoise.com

*admitted *pro hac vice*

Counsel for Syncora Guarantee Inc.

CERTIFICATE OF SERVICE

I hereby certify that on June 21, 2019, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notifications of such filing to all CM/ECF participants in this case.

/s/ Solymar Castillo Morales
Solymar Castillo- Morales